

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

TYRONE HENDERSON, SR., *et al.*,

Plaintiffs,

v.

Civil Action No. 3:20-cv-00294-REP

**THE SOURCE FOR PUBLIC
DATA, L.P., *et al.*,**

Defendants.

**DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' AMENDED COMPLAINT
FOR LACK OF PERSONAL JURISDICTION AND LACK OF VENUE
OR, IN THE ALTERNATIVE, TO TRANSFER VENUE**

Defendants, The Source for Public Data, L.P., d/b/a PublicData.com, Shadowsoft, Inc., Harlington-Straker Studio, Inc., and Dale Bruce Stringfellow (collectively, "Defendants"), by counsel, and pursuant to Fed. R. Civ. P. 12(b)(2), Fed. R. Civ. P. 12(b)(3), 28 U.S.C. § 1404(a), and 28 U.S.C. § 1406(a), submit this Motion to Dismiss Plaintiffs' Amended Complaint [Dkt. No. 25] for Lack of Personal Jurisdiction and Lack of Venue or, in the Alternative, to Transfer Venue to the U.S. District Court for the Northern District of Texas. The reasons for this Motion are set forth in the memorandum contemporaneously filed herewith.

WHEREFORE, Defendants respectfully request that the Court enter an order: (1) dismissing Plaintiffs' claims for lack of personal jurisdiction under Fed. R. Civ. P. 12(b)(2); (2) dismissing Plaintiffs' claims for improper venue under Fed. R. Civ. P. 12(b)(3); or (3) alternatively, transferring this case to the U.S. District Court for the Northern District of Texas.

**THE SOURCE FOR PUBLIC DATA, L.P., D/B/A
PUBLICDATA.COM, SHADOWSOFT, INC.,
HARLINGTON-STRAKER STUDIO, INC., AND
DALE BRUCE STRINGFELLOW**

By: /s/Timothy J. St. George

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of September 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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